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November 7, 2013

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Room TW-A325  
Washington, DC 20554

Re: Petition of Pioneer Telephone Cooperative, Inc. for Waiver of 47 C.F.R. Sections 36.3, 36.123-126, 36.141, 36.152-57, 36.191 and 36.372-382 to Unfreeze Part 36 Category Relationships, CC Doc. No. 80-286.

Petition by Terral Telephone Company, Inc. for Waiver of 47 C.F.R. Sections 36.3, 36.123-126, 36.141, 36.152-157, 36.191 and 36.372-282 to Unfreeze Part 36 Category Relationships, CC Doc. No. 80-286

*Ex Parte* Notice

Dear Ms. Dortch:

On November 5, 2013 Nick Kretchmar, Jo Shotwell, Sharon Minor and I, all representing Pioneer Telephone Cooperative, Inc; and Dick R. Segress, Chad Segress and Mary Sisak representing Terral Telephone Company (collectively the ILECs), met by telephone conference call with Board Member John Burke of Vermont and Commissioners Betsy Wergin of Minnesota and Travis Kavulla of Montana to discuss the above cited waiver petitions. Also on the call were state staff members Sandy Reams of Kansas, Joel Shifman of Maine, George Young of Vermont and Brad Ramsay of NARUC.

The ILEC representatives summarized the issues raised in their Petitions and explained that in earlier *ex parte* meetings FCC personnel had indicated that any action on the Petitions would need to be coordinated with the Separations Joint Board that is considering global separations reform. The ILEC representatives explained that they had agreed to freeze their separations category relationships on the reasonable expectation that the freeze would last five years or less. Unfortunately, in the more than 12 years since that election the companies have made substantial investments which are being miss-allocated based on frozen factors. The FCC has granted similar petitions for a tribally owned ILEC, and a rural ILEC similarly situated to Petitioners, whose requests are the only ones now pending at the FCC.

The ILEC representatives requested that the state members of the Separations Joint Board evaluate whether action on the two pending waivers by the FCC would in any way prejudice the ultimate goal of reforming the separations rules to better function in the current environment.

Please address any questions in this matter to me or Ms. Sisak, respectively. .

Sincerely yours

David Cosson

Counsel to Pioneer Telephone Cooperative, Inc.

cc: Commissioner Burke  
Commissioner Wegin  
Commissioner Kavulla  
J. Bradford Ramsay  
Joel Shifman  
Sandy Reems  
George Young